

**DAVID NEWBIGGING BROWN
O'CONNOR,**

Plaintiff,

V.

**JEFF LONG, in his official capacity
as Commissioner of the Tennessee
Department of Safety and Homeland
Security,**

Defendant.

JURY DEMANDED

**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION
AND TO CONSOLIDATE FOR TRIAL ON THE MERITS**

The plaintiff, David Newbigging Brown O'Connor ("Mr. O'Connor"), pursuant to Fed. R. Civ. P. 65(a)(1), respectfully moves this Court for a preliminary injunction requiring the State of Tennessee ("the State") to issue Mr. O'Connor a Tennessee driver's license and a REAL ID card for the reasons set forth in the Verified Complaint and the accompanying memorandum in support of this Motion. In addition, Mr. O'Connor respectfully requests that this Court consolidate the hearing on this matter for a trial on the merits pursuant to Fed. R. Civ. P. 65(a)(2), there being no material question of fact.

Mr. O'Connor is a citizen of the United States of America. As such, he cannot be deprived of any of the privileges of citizenship of the United States and the State of Tennessee, premised on the arbitrary and incorrect basis that he is not a citizen.

Accordingly, Mr. O'Connor respectfully requests a preliminary injunction requiring the State to issue him a Tennessee driver's license and REAL ID card and to consolidate the hearing

on this matter for a trial on the merits, thereby rendering the injunction to be final and enforceable without security.

Respectfully submitted,

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